

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

ASCENTIUM CAPITAL LLC,
Plaintiff,

v.
DIGITAL SIGN SOLUTIONS LLC and
ARVIN WADDLES,
Defendants.

* CIVIL ACTION NO. 5:21-cv-00255

* JUDGE ELIZABETH E. FOOTE

* MAGISTRATE MARK L. HORNSBY

MOTION FOR DEFAULT JUDGMENT

Plaintiff, Ascentium Capital LLC (“Ascentium”), respectfully files this *Motion for Default Judgment* (the “Motion”) and, for the reasons set forth in the Memorandum in Support filed contemporaneously herewith, respectfully asks the Court to render a default judgment against defendants, Digital Sign Solutions LLC (“DSS”) and Arvin Waddles (“Waddles,” and collectively with DSS, “Defendants”), as authorized by Rule 55(b)(2) of the Federal Rules of Civil Procedure. Defendants have failed to plead, answer, or otherwise defend the claims advanced by Ascentium herein, thus Ascentium seeks a final default judgment against Defendants, *in solido*, on Count I (fraud), Count II (conversion), and Count V (Detrimental Reliance) of the Complaint, as amended, the “Amended Complaint” in the amount of FIVE HUNDRED AND TWENTY-FIVE THOUSAND THREE-HUNDRED AND NINE DOLLARS AND FIFTY CENTS (\$525,309.50); plus prejudgment interest at the legal rate calculated from February 1, 2021 through entry of a judgment herein; plus post judgment interest calculated at the legal rate until the judgment is paid in full.

WHEREFORE, Plaintiff, Ascentium Capital LLC, respectfully requests that the Court enter the default judgment against defendants, Digital Sign Solutions LLC (“DSS”) and Arvin Waddles (“Waddles,” and collectively with DSS, “Defendants”) *in solido*, on Count I (fraud), Count II (conversion), and Count V (Detrimental Reliance) of the Amended Complaint in the total

amount of FIVE HUNDRED AND TWENTY-FIVE THOUSAND THREE-HUNDRED AND NINE DOLLARS AND FIFTY CENTS (\$525,309.50); plus prejudgment interest at the legal rate calculated from February 1, 2021 through entry of a judgment herein; plus post judgment interest calculated at the legal rate until the judgment is paid in full. Alternatively, Ascentium respectfully requests an evidentiary hearing to determine damages.

RESPECTFULLY SUBMITTED

/s/ Lacey E. Rochester

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